

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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ELLIOTT BROIDY and BROIDY CAPITAL
MANAGEMENT, LLC,

Plaintiffs,

- against -

GLOBAL RISK ADVISORS LLC,
GRA MAVEN LLC,
GRA QUANTUM LLC,
GLOBAL RISK ADVISORS EMEA LIMITED,
GRA RESEARCH LLC,
QRYPT, INC.,
KEVIN CHALKER,
DENIS MANDICH,
ANTONIO GARCIA, and
COURTNEY CHALKER,

Defendants.
-----X

Case No. 19-cv-11861-MKV

DECLARATION OF PAUL J. KREMER

I, Paul J. Kremer, declare as follows:

1. I am an associate in the law firm Gibson, Dunn & Crutcher LLP and counsel to Defendants Global Risk Advisors LLC, GRA Maven LLC, GRA Quantum LLC, Global Risk Advisors EMEA Limited, GRA Research LLC, Qrypt, Inc., Kevin Chalker, Denis Mandich, Antonio Garcia, and Courtney Chalker. I am licensed to practice law in the State of New York. I respectfully submit this declaration in support of Defendants' Motion to Dismiss Plaintiffs' Second Amended Complaint.

2. Attached hereto as Exhibit A is a true and correct copy of the Second Amended Complaint filed in the above-captioned matter.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this 3rd day of May 2022 in High Bridge, New Jersey.

A handwritten signature in black ink, appearing to be 'P. J. Kremer', is written over a horizontal line.

Paul J. Kremer